

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CATRINA BATEMAN

v.

ANTONIO YOUNG, JR., and P.A.M.  
TRANSPORTATION SERVICES, INC.

§  
§  
§  
§  
§  
§

C. A. No. 4:15-cv-3129

JURY DEMANDED

---

STIPULATION OF DISMISSAL

---

Plaintiff and Defendant file this stipulation of dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

1. Plaintiff is Catrina Bateman; Defendants are Antonio Young, Jr., and P.A.M. Transportation Services, Inc.

2. Plaintiff sued the defendants on September 8, 2015. Defendants timely removed this action to this court on October 23, 2015, subsequently answer the plaintiff's petition on October 30, 2015.

3. The parties move to dismiss this action because they have agreed to settle the plaintiff's claims.

4. This action is not a class action under Federal Rule of Civil Procedure 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2.

5. A receiver has not been appointed in this action.

6. This action is not governed by any federal statute that requires a court order for dismissal of the case.

7. Plaintiff has not previously dismissed any federal- or state-court action based on or including the same claims as those presented in this action.

9. This dismissal is without prejudice.

Dated: \_\_\_\_\_

Respectfully submitted,

**RAD LAW FIRM, PC**

\_\_\_\_\_  
/s/ Daryoush Toofanian  
Daryoush Toofanian  
SD Bar No 963463  
TBA No. 24039801  
8001 LBJ Fwy, Suite 300  
Dallas, Texas 75251  
Telephone: 972-661-1111  
Facsimile: 972-354-5655  
email: [dtoofanian@radlawfirm.com](mailto:dtoofanian@radlawfirm.com)  
**ATTORNEY-IN-CHARGE FOR PLAINTIFF,  
CATRINA BATEMAN**

**ELLINGTON & ASSOCIATES**

\_\_\_\_\_  
/s/ Owen H. Ellington  
Owen H. Ellington  
State Bar No. 06534001  
Fed ID No. 9926  
77 Sugar Creek Center Blvd., Suite 325  
Sugar Land, Texas 77478  
Tel: (832) 500-4635  
Fax: (832) 999-4016  
E-mail: [oellington@ellingtonlaw.com](mailto:oellington@ellingtonlaw.com)  
**ATTORNEY-IN-CHARGE FOR  
DEFENDANTS, ANTONIO YOUNG, JR., AND  
P.A.M. TRANSPORTATION SERVICES, INC.**

**OF COUNSEL:**

ELLINGTON & ASSOCIATES  
77 Sugar Creek Center Blvd., Suite 325  
Sugar Land, Texas 77478  
Tel: (832) 500-4635  
Fax: (832) 999-4016

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded by Notice of Electronic Filing to the following counsel of record on this the 31<sup>st</sup> day of March, 2017:

Daryoush Toofanian  
Rad Law Firm, PC  
8001 LBJ Fwy, Suite 300  
Dallas, Texas 75251

s/ Owen H. Ellington  
Owen H. Ellington